

**DISTRICT COURT OF THE U.S. VIRGIN ISLANDS
DIVISION OF ST. THOMAS & ST. JOHN**

Monrose Loctar, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

Spartan Concrete Products, LLC, and
Warren Mosler

Defendants.

Case No. 3:19-cv-00117

Jury Trial Demanded

Putative Class Action

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION TO FILE REPLY IN
SUPPORT OF HIS SEALED MOTION TO CERTIFY A RULE 23(B)(3) CLASS**

Plaintiff Monrose Loctar files this unopposed motion for a brief extension, until May 9, 2022, to file his reply in support of his Motion to Certify a Rule 23(b)(3) class. For the reasons set forth below, Plaintiff believes good cause exists for the extension.

**PLAINTIFF'S MEMORANDUM IN SUPPORT OF HIS
MOTION FOR AN EXTENSION**

All of the undersigned attorneys representing Plaintiff in the above-captioned action are diligently preparing for a trial set to begin on May 2, 2022 in the Superior Court before Judge Alphonso Andrews in a case entitled *Kadar Mohansingh v. Amerada Hess Corp.*, et al, SX-2006-CV-00231. The undersigned wish to provide the above-captioned matter the attention it deserves, but are focused on trial prep at the moment. Accordingly, Plaintiff respectfully requests that the Court grant an extension, until May 9, 2022, to file his reply in support of class certification.

The Undersigned has communicated with counsel for Spartan who have indicated that they do not oppose this Motion.

DATED: April 25, 2022

Respectfully submitted,

/s/ H. Rick Yelton, Esq.

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a true and correct copy of the foregoing was served on the following individuals on this 25th day of April, 2022 via CM/ECF:

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